

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

MAD

UNITED STATES OF AMERICA

v.

ABDELMAJI K. LABABNEH a/k/a
"Abu Khalaf," a/k/a "David,"

Defendant.

) Criminal No. 1:14-CR-189 - [REDACTED]

)

) Indictment

)

) Violation: 21 U.S.C. §§ 841(a)(1) and
) (b)(1)(C) and 846
) [Conspiracy to Possess With
) Intent to Distribute and
) Distribute a Controlled
) Substance]

)

)

) 1 Count

)

) County of Offense: Rensselaer

THE GRAND JURY CHARGES:

COUNT 1

[Conspiracy to Possess With Intent to Distribute and Distribute a Controlled Substance]

Between on or about May 17, 2013, and on or about May 23, 2013, in Rensselaer County in the Northern District of New York and elsewhere, the defendant, **ABDELMAJI K. LABABNEH**, and others conspired to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). As to defendant **ABDELMAJI K. LABABNEH**, that violation involved XLR11, a schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C)

All in violation of Title 21, United States Code, Section 846.

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, the defendant, **ABDELMAJI K. LABABNEH**, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: May 14, 2014

A TRUE BILL, Name redacted

Grand Jury Foreperson

RICHARD S. HARTUNIAN
United States Attorney

By:


Jeffrey C. Coffman
Assistant United States Attorney
Bar Roll No. 517969